EXHIBIT C

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THIERRY GUETTA a/k/a MR. BRAINWASH

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN, Plaintiff, vs. THIERRY GUETTA a/k/a MR. BRAINWASH, and DOES 1 through 10, inclusive, Defendants. AND RELATED COUNTER-CLAIM.	Case No. CV10-0014 DDP (JCx) **DEFENDANT THIERRY GUETTA'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET THREE**

PROPOUNDING PARTY: PLAINTIFF GLEN E. FRIEDMAN

RESPONDING PARTY: DEFENDANT THIERRY GUETTA

SET: THREE

Defendant Thierry Guetta hereby submits the following responses to Plaintiff's Request for Production of Documents, Set Three to Defendant Thierry Guetta:

PRELIMINARY STATEMENT

Each of the responses to the individual requests herein incorporates and is subject to this preliminary statement and the general objections set forth below. The preliminary statement and objections form a part of the response to each request and are set forth in this manner to avoid repetition. While the preliminary statement and objections may be referred to specifically in response to an individual request, the failure to do so is not and should not be construed as a waiver thereof. Responding Party has not fully completed his investigation of these matters and has not completed discovery. All of the written responses herein are based solely upon such information and documents presently available, known to or understood by Responding Party. The following responses are given without prejudice to Responding Party' right to supplement, alter or amend these responses as the result of subsequently discovered documents. Responding Party further reserves his right to use as evidence in this action any hereafter-acquired or discovered documents that would have been responsive to these requests for production. Responding Party' responses are not in any way to be deemed an admission or representation that there are no further documents relevant to the subject matter of these requests.

These responses are made subject to, and without in any way waiving or intending to waive:

1. The right to object to other discovery proceedings involving or relating to the same subject matter of the requests; or

2. The right at any time to revise, correct, add to, or clarify any of the responses set forth herein. Furthermore, these responses are given subject to correction of any omissions or errors.

Responding Party will make reasonable efforts to respond to every request, to the extent it has not been objected to, as Responding Party understands imd interprets the request, provided that the request is not so vague, ambiguous and/or unintelligible that a response is impossible. If Responding Party or any other party to this action subsequently asserts an interpretation ofthe request that differs from that of Responding Party, Responding Party reserves the right to supplement his objections and responses as necessary.

GENERAL OBJECTIONS

Responding Party makes the following general objections applicable to each request responded to herein. Whether or not separately set forth in response to each request, these objections apply to the form, scope and substance of all of the definitions, instructions, requests and other matters contained within the First Set of Requests for Production. All such objections to this and any future demand for discovery involving or relating to matters raised herein are reserved and may be asserted at the time of trial or any other hearing.

Responding Party generally objects to each separate request in the First Set of Requests for Production on the following grounds:

Responding Party objects to each request to the extent it calls for privileged information, including but not limited to, information protected by the attorney-client privilege, the attorney work product doctrine or other applicable constitutional, statutory or common law privileges. Responding Party will not provide such information. Any inadvertent production of such information shall not be deemed a waiver of any such privileges.

Responding Party objects to each request to the extent it calls for confidential or proprietary information of Responding Party, third parties, and/or information protected by the right of privacy. Responding Party objects to each request to the extent it attempts or purports to impose any discovery obligations beyond those set forth in the Federal Rules of Civil Procedure. In the following responses, all definitions and other instructions shall be treated as having no force or effect to the extent that they purport to require that Responding Party exceed those duties.

Responding Party objects to each request to the extent it attempts or purports to impose an obligation on Responding Party to investigate or discover information from third parties not under Responding Party' control or persons who are equally accessible to Requesting Party. Responding Party objects to each request on the grounds it is overly broad, vague and ambiguous in its use of the term "YOU" and "YOUR."

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RESPONSES

REQUEST FOR PRODUCTION NO. 34:

All DOCUMENTS that refer in whole or in part to any and all sales made at YOUR "Mr. Brainwash presents Life Is Beautiful" exhibit, held in 2008 at 6121 N. Sunset Blvd., Los Angeles, CA 90028.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced.

REQUEST FOR PRODUCTION NO. 35:

All DOCUMENTS that refer in whole or in part to any and all costs incurred by YOU in the production of YOUR "Mr. Brainwash presents Life Is Beautiful" exhibit, held in 2008 at 6121 N. Sunset Blvd., Los Angeles, CA 90028.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced.

REQUEST FOR PRODUCTION NO. 36:

Please produce any and all e-mails sent or received by any @mrbrainwash.com email address, including but not limited to fineart@rnrbrainwash.com and info@rnrbrainwash.com, that refers in whole or in part to Run-DMC.

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RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced.

REQUEST FOR PRODUCTION NO. 37:

Please produce all recordings of the deposition of Thierry Guetta taken on November 15, 2010 in the instant case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Objection. The request is overbroad, vague and ambiguous. Based on the foregoing objections, no documents will be produced.

REQUEST FOR PRODUCTION NO. 38:

Please produce all correspondence between Patrick Guetta and Thierry Guetta that refers in whole or in part to Run-DMC.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced.

REQUEST FOR PRODUCTION NO. 39:

Please produce all correspondence between Patrick Guetta and Thierry Guetta that refers in whole or in part to Glen E. Friedman.

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RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced.

REQUEST FOR PRODUCTION NO. 40:

Please produce all correspondence between Marc Guetta and Thierry Guetta that refers in whole or in part to Run-DMC.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced. Subject to and without waiving the foregoing responses, Responding Party responds as follows:

Responding is unable to comply with the request as responsive documents never existed.

REQUEST FOR PRODUCTION NO. 41:

Please produce all correspondence between Marc Guetta and Thierry Guetta that refers in whole or in part to Glen E. Friedman.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Objection. The request is overbroad, vague, ambiguous and seeks information that is not relevant to the instant action and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, the request seeks information protected from disclosure by the Constitutional right to privacy, the attorney-client privilege and attorney work product doctrine. Based on the foregoing objections, no documents will be produced. Subject to and without waiving the foregoing responses, Responding Party responds as follows:

Responding is unable to comply with the request as responsive documents never existed.

Dated: December 23, 2010

LAW OFFICES OF ALAN S. GUTMAN

By: ______________________
John Juenger
Attorneys for Defendant and Counter-Claimant
THIERRY GUETTA a/k/a MR. BRAINWASH

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not party to the within action; my business address is 9401 WILSHIRE BLVD., SUITE 575, BEVERLY HILLS, CA 90212-2918.

On **December 22, 2010** I served the foregoing document described as **DEFENDANT THIERRY GUETTA'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET THREE** on all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

DOUGLAS A. LINDE, ESQ.
ERICA ALLEN, ESQ.
THE LINDE LAW FIRM
9000 SUNSET BLVD., SUITE 1025
LOS ANGELES, CA 90069
TELEPHONE: 310-203-9333
FACSIMILE: 310-203-9233

[XX] BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Beverly Hills, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[] E-MAIL: I transmitted the document to which this is attached via email to the email addresses listed above.

[] BY PERSONAL SERVICE: I caused the envelope to be delivered by hand to the offices of the addressee.

[] BY FACSIMILE TRANSMITTAL: I sent by facsimile the above document on at .m. to the facsimile machine number identified above.

[] BY FEDERAL EXPRESS OVERNIGHT DELIVERY: I caused the above document to be sent by Federal Express overnight delivery, fully prepaid, in accordance with Code of Civil Procedure § 1013(c).

Executed on **December 22, 2010** at Beverly Hills, California.

[XX] (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

CECIBEL ESCOBAR